## **EXHIBIT 4**

# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

DEFENSE DISTRIBUTED and \$ Case No. 15-CV-372-RP SECOND AMENDMENT FOUNDATION, INC., \$ Plaintiffs, \$ \$ \$ v. \$ \$ \$ U.S. DEPARTMENT OF STATE, et al., \$ \$ Defendants. \$ \$ \$

#### SUPPLEMENTAL DECLARATION OF PETER VERSNEL

#### I, Peter Versnel, declare:

- 1. I am a citizen of the United States and a resident of the State of Washington. I make this declaration as a supplement to the declaration I provided earlier for use in the above-referenced case. I make this declaration based on my personal knowledge and, if called upon to do so, could and would testify competently to the matters set forth below.
  - 2. I am a member of the Second Amendment Foundation (SAF).
- 3. I am not prohibited from owning lawful firearms by any local, state, or federal law, regulation, or court order.
- 4. But for the threats of criminal and civil liability made to Defense Distributed by the above-referenced Defendants, and those Defendants' related interpretation of ITAR, I would access online, study, share online, and learn from Defense Distributed's various firearms-related files, including files related to the Liberator handgun, as well as similar files related to firearms that Defense Distributed or others have created, for various purposes, including the manufacture and maintenance of lawful firearms that I would use for self-defense. I would access these files

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via the Defense Distributed web site and via the SAF web site and download them from those sites, when posted there. I would also upload and share such files via the SAF web site, so that other United States citizens could download them and use them for constructing and maintaining lawful firearms for self-defense.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the day of June, 2015.

Peter Versnel